

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
TITLE V OPERATING PERMIT TECHNICAL REVIEW DOCUMENT**

**Permitting and Compliance Division
Air and Waste Management Bureau
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P.O. Box 200901
Helena, Montana 69620-0901**

Williston Basin Interstate Pipeline Company
Baker Station
P.O. Box 1527
Baker, Montana 59313

The following table summarizes the air quality testing, monitoring, and reporting requirements applicable to this facility:

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Methods 7 & 10
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semi-annual Reporting Required	X		As applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Montana Air Quality Permitting	X		#2954-00
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
State Implementation Plan (SIP)		X	General SIP

TABLE OF CONTENTS

I.	GENERAL INFORMATION	3
A.	Purpose	3
B.	Facility Location	3
C.	Facility Background Information.....	3
D.	Current Permit Action.....	3
E.	Taking and Damaging Analysis.....	4
F.	Compliance Designation.....	4
II.	SUMMARY OF EMISSION UNITS.....	5
A.	Facility Process Description	5
B.	Emission Units and Pollution Control Device Identification.....	5
C.	Categorically Insignificant Sources/Activities.....	5
III.	PERMIT CONDITIONS.....	6
A.	Emission Limits and Standards.....	6
B.	Monitoring Requirements	6
C.	Test Methods and Procedures	6
D.	Recordkeeping Requirements	6
E.	Reporting Requirements	7
F.	Public Notice.....	7
G.	Draft Permit Comments	7
H.	EPA Comments.....	7
IV.	NON-APPLICABLE REQUIREMENTS ANALYSIS.....	8
V.	FUTURE PERMIT CONSIDERATIONS.....	9
A.	MACT Standards	9
B.	NESHAP Standards	9
C.	NSPS Standards	9
D.	Risk Management Plan	9

I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the operating permit. Conclusions in this document are based on information provided in the original operating permit application submitted by Williston Basin Interstate Pipeline Company (WBI) and received by the Department of Environmental Quality (Department) on June 12, 1996; the modification application received on November 26, 2002; and the renewal application received February 12, 2003.

B. Facility Location

WBI owns and operates the Baker Station. This facility is located in the SE $\frac{1}{4}$ of the SE $\frac{1}{4}$ of Section 12, Township 7 North, Range 59 East, in Fallon County, Montana. Fallon County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. This site is east of Baker on Highway 12. Land use on nearby property is commercial and rangeland/grain croplands. The nearest residence is approximately 2 city blocks away from the site.

C. Facility Background Information

This facility was constructed prior to November 23, 1968, and is therefore grandfathered from the Montana Air Quality permit process. On June 12, 1996, WBI submitted an application for an operating permit. The emission inventory submitted with the application indicated potentials for nitrogen oxides (NO_x) and carbon monoxide (CO) at levels of greater than 100 TPY, which required this facility to obtain an operating permit.

On January 24, 2003, the WBI Baker Station was issued a Montana Air Quality Permit #2954-00, which allowed the addition of a 1,680-hp Waukesha compressor engine with a potential to emit greater than 25 tons per year. The permit was issued for the operation of the Baker Compressor Station; which included six engines, a dehydration unit, and the miscellaneous heaters, boilers, tanks, and, fugitive volatile organic compound (VOC) sources.

D. Current Permit Action

The current permit action is a renewal and major modification of WBI's Title V Operating Permit OP2954-00 for the Baker Compressor Station. WBI's Operating Permit OP2954-00 expires on September 9, 2003. WBI applied for a renewal of their Title V Operating Permit on February 12, 2003. WBI also plans to install a new 1,680-hp Waukesha compressor engine with the potential to emit greater than 25 tons per year. Operating Permit OP2954-01 was renewed with the addition of the new Waukesha engine and to reflect current permit language and rule references used by the Department. Operating Permit **OP2954-01** replaces Operating Permit OP2954-00.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, Montana Code Annotated (MCA), the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on January 27, 2003.

F. Compliance Designation

A member of the Department visited the Baker Station on January 15, 2003. Photos were taken and verification of equipment was done at that time. All serial numbers, makes and models stated in the application coincide with those recorded during the site visit.

II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The Baker Station is a natural gas pipeline booster station. It also pulls suction on storage fields as well as production fields. Field and production gas is pumped up to the required pressure in the natural gas transmission line. Compression of the gas is accomplished using the six compressor engines on site. Space heaters provide the heat to the various station facilities. Also the gas is dried as it is being processed using a regenerator heater. The gas contains some moisture, which must be removed from the system prior to being sent into the transmission system. Burning natural gas in the regenerator heater generates the heat necessary to remove the moisture. The Standard Industrial Classification (SIC) for this facility is "Natural Gas Transmission" which has an SIC Code of "4922".

B. Emission Units and Pollution Control Device Identification

Currently, the Baker Station has two 330-horsepower (hp) Ingersoll Rand compressor engines, three 540-hp Cooper-Bessemer compressor engines, one 1,680-hp Waukesha compressor engine, and one 3-MMBtu (million British Thermal Units) direct-fired regenerator heater (dehydrator). NO_x and CO emissions from the 1,680-hp Waukesha compressor engine will be controlled with a non-selective catalytic reduction (NSCR) unit and an air/fuel ratio (AFR) controller, while burning pipeline quality natural gas in this engine minimizes VOC emissions.

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) states that if an emitting unit has an applicable requirement, then it is not an insignificant emitting unit.

This facility has some pieces of equipment that are insignificant emissions units. They include: various building heaters less than 1-MMBtu/hr, one Mueller steam boiler used for space heating, one tank heater, three tanks and numerous process valves, flanges, open-ended lines, seals, etc.

III. PERMIT CONDITIONS

A. Emission Limits and Standards

Emission limits for the 330-hp Ingersoll Rand engines were established under the authority of ARM 17.8.710 and the emission limits for the 1,680-hp Waukesha engine were established by a BACT determination under the authority of ARM 17.8.715. The 330-hp Ingersoll Rand engines have an emission limit of 9.10 lb/hr NO_x. The 1,680-hp Waukesha engine has emission limits of 7.41 lb/hr NO_x, 11.11 lb/hr CO, and 3.70 lb/hr VOC.

The emission units at this facility are not subject to any current MACT, NESHAP, or NSPS. This facility is not subject to PSD regulations.

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements be contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emissions units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (**i.e., no monitoring**) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emissions units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm its compliance status.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least 5 years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in *The Fallon County Times* newspaper on or before April 18, 2003. The Department provided a 30-day public comment period from April 18, 2003, to May 19, 2003, on the draft-operating permit. ARM 17.8.1232 required the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by May 19, 2003, will be summarized, along with the Departmental response, in the following tables. Furthermore, all comments received during the public comment period will be forwarded to WBI so that they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Identity of Commenter	Comment	Department Response
No Comments		

G. Draft Permit Comments

Summary of Permittee Comments

Permit Location	Permittee Comment	Department Response
No Comments		

H. EPA Comments

Summary of EPA Comments

Permit Location	EPA Comment	Department Response
No Comments		

IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

Section IV of the operating permit "Non-applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that WBI identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Requirement not Identified in the Operating Permit

Applicable Requirement	Reason
40 CFR 61, Subpart M National Emissions Standards for Hazardous Air Pollutants - Asbestos	This is a federal regulation that has specific procedural requirements that may become relevant to the major source during the permit term.

V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

As of the issuance date of Operating Permit OP2954-01, the Department is unaware of any future MACT Standards that may be promulgated that will affect this facility.

B. NESHAP Standards

As of the issuance date of Operating Permit OP2954-01, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

C. NSPS Standards

As of the issuance date of Operating Permit OP2954-01, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility.

D. Risk Management Plan

As of the issuance date of Operating Permit OP2954-01, this facility does not have any substance listed in 40 CFR 68.115 or 40 CFR 68.130, which exceeds the minimum threshold quantities. Also, this facility is subject to DOT regulations for accidental release prevention; consequently, this facility is not required to submit a Risk Management Plan.